

Hearing Date and Time: March 11, 2010 at 2:00 p.m.
Objection Deadline: March 4, 2010 at 4:00 p.m.

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Bankruptcy Counsel to Lead Plaintiff in the Mortgage Backed Securities Litigation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS INC., *et*
al.,

Debtors.

Chapter 11

Case No. 08-13555 (JMP)

(Jointly Administered)

Relates to Docket No. 5659

**JOINDER OF THE MBS LEAD PLAINTIFF IN THE SECURITIES LEAD
PLAINTIFFS' RESPONSE AND RESERVATION OF RIGHTS IN CONNECTION
WITH THE EXAMINER'S MOTION TO ESTABLISH PROCEDURES TO UNSEAL
THE EXAMINER'S REPORT**

Locals 302 and 612 of the International Union of Operating Engineers – Employers Construction Industry Retirement Trust (the “**MBS Lead Plaintiff**”), the Court-appointed lead plaintiff in the consolidated securities class action pending in the United States District Court for the Southern District of New York (the “**District Court**”) captioned *In re Lehman Brothers Mortgage Backed Securities Litigation*, Case No. 08-Civ-6762 (LAK) (the “**Mortgage-Backed Securities Litigation**”) and Plaintiff New Jersey Carpenters Health Fund (the “New Jersey Carpenters”) and Plaintiff Boilermakers-Blacksmith National Pension Trust (the “**Boilermakers**”) (the “**MBS Plaintiffs**”), as additional named plaintiffs in the Mortgage-Backed Securities Litigation, by and through their undersigned counsel, submit this joinder in the response and reservation of rights in connection with the motion (the “**Motion**”) by Anton R.

Valukas, Esq., in his capacity as the examiner (the “Examiner”)¹ in these cases (the “Response”) filed by Alameda County Employees’ Retirement Association, Government of Guam Retirement Fund, Northern Ireland Local Government Officers’ Superannuation Committee, City of Edinburgh Council as Administering Authority of the Lothian Pension Fund, and Operating Engineers Local 3 Trust Fund, the court-appointed lead plaintiffs (the “Securities Lead Plaintiffs”) in the consolidated securities class action pending in the United States District Court for the Southern District of New York captioned, *In re Lehman Brothers Equity/Debt Securities Litigation*, Case No. 08-05523 (LAK). In support of this joinder, the MBS Plaintiffs respectfully state:

JOINDER

1. For the reasons and on the authority cited in the Response, the MBS Plaintiffs join in the Response and reserve their rights as set forth in the Response.

Respectfully submitted,

LOWENSTEIN SANDLER PC

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¹ Unless otherwise defined herein, capitalized terms shall have the meaning ascribed to them in the Motion.

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Dated: March 4, 2010

New York, New York